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Counsel for Defendants,

Meta Platforms, Inc. and Meta Platforms Technologies, LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

GENTEX CORPORATION and INDIGO
TECHNOLOGIES, LLC,

Plaintiffs,

THALES VISIONIX, INC.,

Involuntary Plaintiff,

v.

META PLATFORMS, INC. and META
PLATFORMS TECHNOLOGIES, LLC,

Defendants.

Case No. 3:20-cv-07083-VC

**DECLARATION OF JOSHUA GLUCOFT
IN SUPPORT OF DEFENDANTS META
PLATFORMS, INC. AND META
PLATFORMS TECHNOLOGIES, LLC'S
NOTICE OF MOTION AND MOTION
FOR LEAVE TO FILE AMENDED
ANSWER**

Date: May 2, 2023
Time: 2:00 p.m.
Location: Courtroom 1, 4th Floor
Judge: Hon. Yvonne Gonzalez Rogers

1 I, Joshua Glucoft, do hereby declare as follows:

2 1. I am an attorney licensed to practice law in the State of California and am a partner
3 with the law firm of Kirkland & Ellis LLP, located at 2049 Century Park East, Suite 3700, Los
4 Angeles, CA 90067. I am counsel for Defendants Meta Platforms, Inc. and Meta Platform
5 Technologies, LLC (collectively, “Meta”) in the above-captioned action. I have personal knowledge
6 of the matters set forth below and if called and sworn as a witness, I could and would testify
7 competently to the facts set forth herein.

8 2. I make this declaration in support of Meta’s Motion for Leave to File an Amended
9 Answer to Plaintiffs’ Complaint.

10 3. Attached as Exhibit 1 is a true and correct copy of an email from A. Argall, dated May
11 10, 2022.

12 4. Attached as Exhibit 2 is a true and correct copy of Meta’s Subpoena to Testify at a
13 Deposition in a Civil Action to Eric Foxlin.

14 5. Attached as Exhibit 3 is a true and correct copy of an email from A. Borrasso, dated
15 September 7, 2022.

16 6. Attached as Exhibit 4 is a true and correct copy of an email from A. Borrasso, dated
17 October 17, 2022.

18 7. Attached as Exhibit 5 is a true and correct copy of an email from L. Harris, dated
19 December 9, 2022.

20 8. Attached as Exhibit 6 is a true and correct copy of an email from L. Harris, dated
21 January 12, 2023.

22 9. Attached as Exhibit 7 is a true and correct copy of an email from L. Harris, dated
23 February 6, 2023.

24 10. Attached as Exhibit 8 is a true and correct copy of an email from E. Wilson, dated
25 February 10, 2023.

26 11. Attached as Exhibit 9 is a true and correct copy of an email from E. Wilson, dated
27 February 27, 2023.

1 12. Attached as Exhibit 10 is a true and correct copy of an email from M. Collins, dated
2 March 1, 2023.

3 13. Attached as Exhibit 11 is a true and correct copy of redline comparison of Meta's
4 Answer to the Complaint, dated September 27, 2021, to Meta's Proposed Amended Answer to
5 Plaintiffs' Complaint, dated March 2, 2023.

6 14. Attached as Exhibit 12 is a true and correct copy of Meta's Proposed Amended Answer
7 to Plaintiffs' Complaint, dated March 2, 2023.

8 15. Attached as Exhibit A is a true and correct copy of Exhibit A to Meta's Proposed
9 Amended Answer.

10 16. Attached as Exhibit B is a true and correct copy of Exhibit B to Meta's Proposed
11 Amended Answer.

12 17. Attached as Exhibit C is a true and correct copy of Exhibit C to Meta's Proposed
13 Amended Answer.

14 18. Attached as Exhibit D is a true and correct copy of Exhibit D to Meta's Proposed
15 Amended Answer.

16 19. Attached as Exhibit E is a true and correct copy of Exhibit E to Meta's Proposed
17 Amended Answer.

18 20. Attached as Exhibit F is a true and correct copy of Exhibit F to Meta's Proposed
19 Amended Answer.

20 21. Attached as Exhibit G is a true and correct copy of Exhibit G to Meta's Proposed
21 Amended Answer.

22 22. Attached as Exhibit H is a true and correct copy of Exhibit H to Meta's Proposed
23 Amended Answer.

24 23. Attached as Exhibit I is a true and correct copy of Exhibit I to Meta's Proposed
25 Amended Answer.

26 24. Attached as Exhibit J is a true and correct copy of Exhibit J to Meta's Proposed
27 Amended Answer.

1 25. Attached as Exhibit K is a true and correct copy of Exhibit K to Meta's Proposed
2 Amended Answer.

3 26. Attached as Exhibit L is a true and correct copy of Exhibit L to Meta's Proposed
4 Amended Answer.

5 27. Attached as Exhibit M is a true and correct copy of Exhibit M to Meta's Proposed
6 Amended Answer.

7 28. Attached as Exhibit N is a true and correct copy of Exhibit N to Meta's Proposed
8 Amended Answer.

9 29. Attached as Exhibit O is a true and correct copy of Exhibit O to Meta's Proposed
10 Amended Answer.

11 30. Attached as Exhibit P is a true and correct copy of Exhibit P to Meta's Proposed
12 Amended Answer.

13 31. Attached as Exhibit Q is a true and correct copy of Exhibit Q to Meta's Proposed
14 Amended Answer.

15 32. Attached as Exhibit R is a true and correct copy of Exhibit R to Meta's Proposed
16 Amended Answer.

17 33. Attached as Exhibit S is a true and correct copy of Exhibit S to Meta's Proposed
18 Amended Answer.

19 34. Attached as Exhibit T is a true and correct copy of Exhibit T to Meta's Proposed
20 Amended Answer.

21 35. Attached as Exhibit U is a true and correct copy of Exhibit U to Meta's Proposed
22 Amended Answer.

23 36. Attached as Exhibit V is a true and correct copy of Exhibit V to Meta's Proposed
24 Amended Answer.

25 37. Attached as Exhibit W is a true and correct copy of Exhibit W to Meta's Proposed
26 Amended Answer.

27 38. Attached as Exhibit X is a true and correct copy of Exhibit X to Meta's Proposed
28 Amended Answer.

1 39. Attached as Exhibit Y is a true and correct copy of Exhibit Y to Meta's Proposed
2 Amended Answer.

3 40. Attached as Exhibit Z is a true and correct copy of Exhibit Z to Meta's Proposed
4 Amended Answer.

5 41. Attached as Exhibit AA is a true and correct copy of Exhibit AA to Meta's Proposed
6 Amended Answer.

7 42. Attached as Exhibit BB is a true and correct copy of Exhibit BB to Meta's Proposed
8 Amended Answer.

9 43. Attached as Exhibit CC is intentionally omitted.

10 44. Attached as Exhibit DD is a true and correct copy of Exhibit DD to Meta's Proposed
11 Amended Answer.

12 45. Attached as Exhibit EE is a true and correct copy of Exhibit EE to Meta's Proposed
13 Amended Answer.

14 46. Attached as Exhibit FF is a true and correct copy of Exhibit FF to Meta's Proposed
15 Amended Answer.

16 47. Attached as Exhibit GG is a true and correct copy of Exhibit GG to Meta's Proposed
17 Amended Answer.

18 48. Attached as Exhibit HH is a true and correct copy of Exhibit HH to Meta's Proposed
19 Amended Answer.

20 49. Attached as Exhibit II is a true and correct copy of Exhibit II to Meta's Proposed
21 Amended Answer.

22 50. Attached as Exhibit JJ is a true and correct copy of Exhibit JJ to Meta's Proposed
23 Amended Answer.

24 51. Attached as Exhibit KK is a true and correct copy of Exhibit KK to Meta's Proposed
25 Amended Answer.

26 52. Attached as Exhibit LL is a true and correct copy of Exhibit LL to Meta's Proposed
27 Amended Answer.

1 53. Attached as Exhibit MM is a true and correct copy of Exhibit MM to Meta's Proposed
2 Amended Answer.

3 54. I declare under penalty of perjury under the laws of the United States of America that
4 the foregoing is true and correct to the best of my knowledge.

5 Executed this 2nd day of March, 2023 in Los Angeles, California.

6
7 /s/ Joshua Glucoft

Joshua Glucoft

8 *Counsel for Defendants,*

9 *Meta Platforms, Inc. and Meta Platforms*
10 *Technologies, LLC*
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